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IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	Case No. 2:22-cv-02059-APG-DJA
Plaintiff,)	
)	
v.)	STIPULATION REGARDING THE
)	EXTENSION OF PRETRIAL ORDER
LAWRENCE J. SEMENZA II, <i>et al.</i> ,)	DEADLINE
)	
Defendants.)	
)	

Pursuant to LR 6-1, the Plaintiff the United States of America and Defendants Philippe Schaad, and Shooting Gallery Publications, LLC (collectively, the “Parties”)¹ stipulate and move the Court to extend the pretrial order deadline in this case.

On May 16, 2025, the Court entered an order resolving the Parties’ dispositive motions. (Dkt. 76). The Court granted the United States’ request to reduce the Semenzas’ federal tax assessments at issue to judgment but denied both Parties’ motions for summary judgment with respect to their requests that the Court distribute the proceeds from the sale of the Semenzas’ home, finding that the issue of the entitlement to these proceeds was an issue for trial.²

Pursuant to the scheduling order in this case, Dkt. 19, the Parties’ pretrial order is due 30 days after the Court’s decision on their dispositive motions, or on June 16, 2025. This pretrial

¹ The Court has granted the relief sought against the Semenzas, and so these are the remaining parties.

² The Parties agree that there has been no jury demand in this case, and that such trial would be a bench trial.

1 order must include information such as the list of witnesses to be called at trial, and the portions
2 of depositions that are designated for trial. (LR 16-3).

3 Because they reside in Portugal, the United States cannot subpoena or compel the
4 Semenzas or Mr. Schaad to attend trial. Consequently, on May 20, 2025, it reached out to
5 counsel for the Semenzas and Mr. Schaad to determine whether they would attend trial, or
6 whether the United States would need to designate portions of their depositions. Despite follow-
7 up, counsel for the Semenzas has never responded.

8 The Parties, however, have been discussing pretrial preparations, as well as the
9 possibility of settlement, and have agreed that it would be in the best interests of this case to seek
10 an extension of the pretrial deadline. Good cause exists to grant this extension for a few reasons.
11 First, Mrs. Semenza recently died. This has made it more difficult for Mr. Semenza and Mr.
12 Schaad to participate in pretrial planning or settlement discussions. Second, the Parties have still
13 not received an answer as to whether Mr. Semenza or Mr. Schaad will attend trial, and the
14 Parties need to know this information for the pretrial order. Third, the Parties are exploring the
15 possibility of settlement, and it would be a more efficient use of resources to determine whether
16 settlement is possible before investing more time and resources into pretrial preparations.

17 For the above reasons, and for good cause shown, the Parties therefore seek that the
18 current pretrial deadline, set for June 16, 2025, be extended by 45 days, to July 30, 2025.

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20
21
22 Respectfully submitted this 12th day of June, 2025.

23 **MCMENEMY HOLMES PLLC**

U.S. DEPT. OF JUSTICE, TAX DIVISION

24 By /s/ Dustun Holmes

By /s/ Kenton McIntosh

Dustun H. Holmes

Kenton McIntosh

25 *Attorney for Philippe Schaad and Shooting*
26 *Gallery Publications, LLC*

Attorney for the United States

ORDER

IT IS SO ORDERED that the stipulation (ECF No. 77) is GRANTED. The joint pretrial order is due by July 30, 2025.

DATED: 6/13/2025

A handwritten signature in blue ink, appearing to read 'D. Albrechts', is written over a horizontal line.

DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE